

# **EXHIBIT 18**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BRITAX CHILD SAFETY, INC.,	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 5:17-cv-02724-JFL
v.	)	
	)	
NUNA INTERNATIONAL B.V. and	)	
NUNA BABY ESSENTIALS, INC.,	)	
	)	
Defendants.	)	

**DECLARATION OF R. MAXWELL MAULDIN**

I, R. Maxwell Mauldin, declare and state as follow:

I am an attorney at Finnegan LLP licensed to practice law in the State of Georgia and counsel for Defendants Nuna International B.V. and Nuna Baby Essentials, Inc. (together, “Nuna”) in the present action. I make this Declaration based on my personal knowledge and with regards to Nuna’s purchase of a Britax Boulevard 70 car seat:

1. I began searching for a suitable car seat after Nuna’s Supplemental Invalidity Contentions were served on March 5, 2020.
2. I located potential options that might be Boulevard 70 car seats and conducted research to determine if the car seats corresponded to the model of interest.
3. Attached as Exhibit A to this Declaration is a true and correct copy of the eBay listing that I located on April 7, 2020.
4. Attached as Exhibit B to this Declaration is a true and correct copy of an email exchange with the seller associated with the eBay listing in Exhibit A. I contacted the seller on

April 7, 2020, via eBay because I questioned aspects of the eBay listing, including the title of the listing.

5. The seller contacted me via email on April 10, 2020, and explained that he would not provide further details.

6. I considered other options and attempted to purchase a different Boulevard 70 car seat on April 28, 2020, from [www.dmartstores.com](http://www.dmartstores.com).

7. The order from [www.dmartstores.com](http://www.dmartstores.com) was not filled and no product was shipped.

8. I ordered the Boulevard 70 car seat from the eBay listing on April 29, 2020.

9. The Boulevard 70 car seat arrived at Finnegan's Atlanta office on May 6, 2020.

10. I sent the car seat to the expert, Mr. Bowman, on May 8, 2020.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 19, 2020



R. Maxwell Mauldin

# **EXHIBIT A**

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Britax Advocate Clicktight Convertible Car Seat Baby  
\$248.35  
~~\$275.05~~  
Free shipping



Britax Advocate Clicktight Convertible Car Seat Baby  
\$344.99  
~~\$352.00~~  
Free shipping  
**Almost gone**



New Corner Guards Baby Safety Clear Furniture Cor-  
\$14.99  
Free shipping  
**Almost gone**



Britax Highpoint Belt-Positioning Child Safety Booster  
\$169.99  
Free shipping



New 20 PCS Silicone Corner Edge Protector Cush-  
\$7.99  
Free shipping



Britax 2-pack Baby Carrier Bibs, White Brand New!  
\$15.99  
Free shipping

Similar sponsored items

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NIP Britax EZ-Cling Window Shades 2 Pack Black

\$26.99

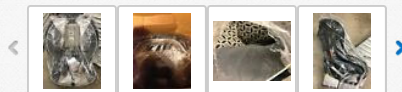
+ \$4.99 Shipping



Britax EZ-Cling Car Window Sun Shades - 2 Pack - UPF

\$9.99

+ \$4.70 Shipping



\$ Have one to sell?

[Sell now](#)

## Britax Boulevard 70 Clicktight Car Seat Child Safety Brand NEW

Seller : [truebargains85](#) (34 ★) 100% Positive feedback

[Save this Seller](#) | [Contact seller](#) | [See other items](#)

Condition: **New**

Sold for: **US \$300.00**

[\\$25 for 12 months \\*](#)

Already paid? Go to your [eBay Bucks - Activity View](#) to see your [Bucks](#).

Shipping: **FAST 'N FREE**

Guaranteed by **Wed. May. 13** | [See details](#)

Item location: Aspen, Colorado, United States

Ships to: United States and many other countries | [See details](#)

Payments:

**PayPal CREDIT**

\*\$25 for 12 months. Minimum purchase required. [Apply Now](#) | [See terms](#)

Earn up to 5x points when you use your eBay Mastercard. [Learn more](#)

Returns: Seller does not accept returns | [See details](#)

Guarantee: **ebay MONEY BACK GUARANTEE** | [See details](#)

Get the item you ordered or get your money back.  
Covers your purchase price and original shipping.

[Description](#)

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Seller assumes all responsibility for this listing.

Last updated on **Jun 26, 2019 16:45:19 PDT** [View all revisions](#)

eBay item number: 282698730598

Item specifics

Condition:	<b>New:</b> A brand-new, unused, unopened, undamaged item in its original packaging (where packaging is applicable). Packaging should be the same as what is found in a retail store, unless the item is handmade or was packaged by the manufacturer in non-retail packaging, such as an unprinted box or plastic bag. See the seller's listing for full details. <a href="#">See all condition definitions</a>	Brand:	Britax
Bundle Listing:	No	Model:	Boulevard Clicktight
Color:	Gray	Country/Region of Manufacture:	United States

Britax Boulevard 70 Clicktight Car Seat Child Safety Brand NEW Still in the box and plastic. Was purchased for \$650 and was never used. Good for children 6 months to 6 years of age or up to 70 pounds.

Related sponsored items 1/2

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New Corner Guards Baby  
Safety Clear Furniture Cor-

**\$14.99**

Free shipping

Almost gone



Britax Advocate Clicktight  
Convertible Car Seat Baby

**\$248.35**

~~\$275.95~~

Free shipping



Protector de pezones de sili-  
cona Para Alimentar A Tu

**\$9.95**

Free shipping



12x Clear Rubber Furniture  
Corner Edge Table Cushion

**\$7.79**

Free shipping



Nuby All Natural Teething  
gel with FREE gum-eez

**\$7.25**

~~\$10.99~~

Free shipping



Britax Highpoint Belt-Posi-  
tioning Child Safety Booster

**\$169.99**

Free shipping

Explore more sponsored options:



Britax EZ-Cling Car Window  
Sun Shades - 2 Pack - UPF

**\$9.99**

+ Shipping

People who viewed this item also viewed

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NIP Britax EZ-Cling Window  
Shades 2 Pack Black

\$26.99

+ \$4.99 Shipping



Britax EZ-Cling Car Window  
Sun Shades - 2 Pack - UPF

\$9.99

+ \$4.70 Shipping

Visit Website

Ad info.com ▼

**Britax Car Seat Boulevard 70 - Britax Car Seat Boulevard 70**

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**Boulevard 70 Car Seat - Boulevard 70 Car Seat**

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**Britax™ Clicktight Car Seats - Safety and Comfort from Britax**

Unique Installation System, Superior **Safety**, and Reknowned Comfort from **Britax**. Enjoy Free Shipping + Reward Points on Your Purchase of a **Britax Clicktight** Model. In business since 1933! Spend \$49+, ship free! Fabulous rewards program. Convenient **baby** registry.

★★★★★ (4.6)

Advocate Car Seats Marathon Car Seats Boulevard Car Seats Britax Sale

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Ad kohls.com ▼

**Shop Britax at Kohl's® - Free Shipping on \$75 Orders**

**Brands** You Love. Shopping That's Easy. Savings That Add Up. Every. Single. Day. Shop the Best **Brands**. Mobile Sale Alerts. Hassle-Free Returns. Incredible Savings. **Brands: Britax, Graco, Evenflo, Carter's, Fisher-Price, OshKosh.**

★★★★★ (4.6)

5701 Kingstowne Blvd, Kingstowne, VA

Kohl's Cares for Kids Infant Clothing 0-24  
Baby Girl 0-24 months Limited Contact Drive Up  
Baby Gear Baby Boy 0-24 months

Visit Website

Ad buybuybaby.com ▼

**Britax Boulevard Car Seat - buybuy BABY® Official Site - buybuyBABY.com**

Everything for Newborns to Toddlers. Online At buybuy **BABY®**. Shop Now! Shop All the **Brands** You Love. Price Match Guarantee. Free And Easy Returns. Buy Online Or In Store. Up to 20% Off **Car Seats**. **Brands: Chicco, Britax, Graco, Balboa Baby.**

★★★★★ (4.7)

1683 Rockville Pike, Rockville, MD

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# **EXHIBIT B**



Maxwell Mauldin &lt;maxwell.mauldin@gmail.com&gt;

**Re: Details about item: richarmauldi\_0 sent a message about Britax Boulevard 70 Clicktight Car Seat Child Safety Brand NEW #282698730598**

1 message

**eBay - truebargains85** <trueba\_hy5109oeo@members.ebay.com>  
To: maxwell.mauldin@gmail.com

Fri, Apr 10, 2020 at 9:45 PM

New message: Hello I am sorry about the delayed re...

New message from: **truebargains85** (34 ★)

Hello I am sorry about the delayed response I am not sure how it clicks in in the back but it's brand new and still in the box. If you could do some research on it would easiest. it's in my storage unit and I'm not near it at the moment I would only go in and grab it if you want to purchase it please let me know if you'd still like it thanks

———/7/20, 15:44, richarmauldi\_0 wrote:

Details about item: richarmauldi\_0 sent a message about Britax Boulevard 70 Clicktight Car Seat Child Safety Brand NEW #282698730598

Hello:

I'm interested in this product. I just need to see how it locks the belt down. Does it use two lock-offs in the middle part? Thanks so much!

Max

[Reply](#)[Make an offer](#)**Your previous message**

Hello:

I'm interested in this product. I just need to see how it locks the belt down. Does it use two lock-offs in the middle part? Thanks so much!

Max

## Britax Boulevard 70 Clicktight Car Seat Child Safety Brand NEW



**Price: \$300.00**

Buy it now

Watchers: 1

Quantity Remaining: 1

Free Shipping

Buy it now

### Get to know the seller [truebargains85](#)

- Located: Aspen, CO, United States
- Member since: Mar 04, 2006
- Positive Feedback: 100%

We scan messages to enforce policies. Only purchases on eBay are covered by the eBay purchase protection programs. Asking your trading partner to complete a transaction outside of eBay is not allowed.

Email reference id: [\[#a04-kbwxtsoxgy#\]](#) [\[#af020d9e5e75417197c20b10e118dd43#\]](#)

We don't check this mailbox, so please don't reply to this message. If you have a question, go to [Help & Contact](#).

eBay sent this message to Richard Mauldin (richarmauld\_0). Learn more about [account protection](#). eBay is committed to your privacy. Learn more about our [privacy notice](#) and [user agreement](#).

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